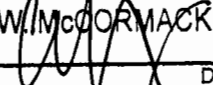


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JUL - 6 2017

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JAMES W. MCCORMACK, CLERK
By:  DEP. CLERK

UNITED STATES OF AMERICA)

No. 4:17-cr-00 *184 BSM*

v.)

FILED UNDER SEAL

MICHAEL MCCLELLAN)

aka ROOSTER)

21 U.S.C. § 841(a)(1)

CHAD THOMPSON)

21 U.S.C. § 846

JEFF JARBOE)

21 U.S.C. § 843(a)(3)

MELANIE HULSEY)

18 U.S.C. § 3013

JACKIE GALLARDO)

18 U.S.C. § 3583

LINDA FENNELL)

18 U.S.C. § 3571

RAYMOND ENGLERTH)

LAUREN DEMPSEY)

HEATHER MCDANIEL)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Beginning in or about October 2012, and continuing through on or about July 6, 2017, in the
Eastern District of Arkansas and elsewhere,

MICHAEL MCCLELLAN,
aka ROOSTER;
CHAD THOMPSON
JEFF JARBOE;
MELANIE HULSEY;
JACKIE GALLARDO;
LINDA FENNELL;
RAYMOND ENGLERTH;
LAUREN DEMPSEY; and
HEATHER MCDANIEL

did conspire with each other and others known and unknown to the grand jury to knowingly and
intentionally possess with intent to distribute and to distribute Oxycodone, Hydrocodone, and
Hydromorphone, Schedule II controlled substances, and other controlled substances without an

effective prescription in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C) and (b)(1)(E).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about January 26, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 3

On or about March 9, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 4

On or about April 2, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 5

On or about April 13, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 6

On or about May 8, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 7

On or about May 16, 2015, in the Eastern District of Arkansas, the defendant,

MICHAEL MCCLELLAN,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 8

On or about March 12, 2016, in the Eastern District of Arkansas, the defendant,

HEATHER MCDANIEL,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 9

On or about August 29, 2016, in the Eastern District of Arkansas, the defendant,

LINDA FENNELL,

knowingly and intentionally obtained Hydrocodone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

COUNT 10

On or about October 7, 2014, in the Eastern District of Arkansas, the defendant,

CHAD THOMPSON,

knowingly and intentionally obtained Hydromorphone, a Schedule II controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, in violation of Title 21, United States Code, Section 843(a)(3).

[End of text. Signature page to follow.]